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UNITED STATES OF AMERICA	:
	:
-v.-	:
	:
JASON GALANIS,	:
	:
Defendant.	:
-----	X

**CONSENT PRELIMINARY ORDER OF
FORFEITURE AS TO SPECIFIC
PROPERTIES/MONEY JUDGMENT**

S2 15 Cr. 643 (PKC)

WHEREAS, on January 31, 2020, JASON GALANIS (the “Defendant”) was charged in a seven-count Superseding Information, S2 15 Cr. 643 (PKC) (the “Information”) with conspiracy to commit securities fraud, in violation of Title 18, United States Code, Section 371 (Counts One, Four, and Five); securities fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff; Title 17, Code of Federal Regulations, Section 240.10b-5; and Title 18, United States Code, Section 2 (Counts Two and Six); investment adviser fraud, in violation of Title 15, United States Codes, Sections 80b-6 and 80b-17 and Title 18, United States Code, Section 2 (Count Three); and conspiracy to commit investment adviser fraud, in violation of Title 18, United States Code, Section 371 (Count Seven);

WHEREAS, the Information included a forfeiture allegation as to Counts One through Seven of the Information seeking, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, the forfeiture of any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One through Seven of the Information;

WHEREAS, on or about January 31, 2020, the Defendant pled guilty to Counts One through Seven of the Information pursuant to a plea agreement with the Government, wherein

the defendant admitted the forfeiture allegation with respect to Counts One through Seven of the Information and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, the following:

- a. a sum of money equal to \$80,869,117.10 in United States currency, representing any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Counts One through Seven of the Information; and
- b. all, right, title and interest of the Defendant in the following property:
 - i. \$2,170,000 in United States currency representing the sale proceeds of 1920 Bel Air Road, Los Angeles, California 90077; and
 - ii. \$11,000,000 in United States currency representing the sale proceeds of 260 West Broadway, Unit 1, New York, New York 10013;

(together, the "Specific Properties");

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$80,869,117.10 in United States currency, representing any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Counts One through Seven of the Information and to the forfeiture of all of his right, title and interest in the Specific Properties;

WHEREAS, the Defendant further consents to the forfeiture of all his right, title and interest in the Specific Properties, which constitutes proceeds traceable to the offenses charged in Counts One through Seven of the Information;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the defendant, the proceeds traceable to the offense charged in Count One of the Information that the defendant personally obtained cannot be located upon the exercise of due diligence, with the exception of the Specific Properties; and

WHEREAS, pursuant to Title 21, United States Code, Section 853(g), and Rules 32.2(b)(3), and 32.2(b)(6) of the Federal Rules of Criminal Procedure, the Government is now entitled, pending any assertion of third-party claims, to reduce the Specific Properties to its possession and to notify any and all persons who reasonably appear to be a potential claimant of their interest herein;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Geoffrey S. Berman, United States Attorney, Assistant United States Attorney BRIAN R. BLAIS, of counsel, and the Defendant, and his counsel, CHRISTOPHER MADIOU, Esq., that:

1. As a result of the offenses charged in Counts One through Seven of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$80,869,117.100 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offense charged in Counts One through Seven of the Information that the defendant personally obtained shall be entered against the Defendant.

2. As a result of the offenses charged in Counts One through Seven of the Information, to which the Defendant pled guilty, all of the Defendant's right, title and interest in the Specific Properties is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture as to Specific Properties/Money Judgment is final as to the Defendant, JASON GALANIS, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

4. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the defendant's name and case number.

5. The United States Marshals Service is authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

6. Upon entry of this Consent Preliminary Order of Forfeiture as to Specific Properties/Money Judgment, the United States (or its designee) is hereby authorized to take possession of the Specific Properties and to hold such property in its secure custody and control.

7. Pursuant to Title 21, United States Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, the United States is permitted to publish forfeiture notices on the government internet site, www.forfeiture.gov. This site incorporates the forfeiture notices that have been traditionally published in newspapers. The United States forthwith shall publish the internet ad for at least thirty (30) consecutive days. Any person, other than the defendant, claiming interest in the Specific Property must file a Petition within sixty (60) days from the first day of publication of the Notice on this official government internet web site, or no later than thirty-five (35) days from the mailing of actual notice, whichever is earlier.

8. The published notice of forfeiture shall state that the petition (i) shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the Specific Properties,

(ii) shall be signed by the petitioner under penalty of perjury, and (iii) shall set forth the nature and extent of the petitioner's right, title or interest in the Specific Properties, the time and circumstances of the petitioner's acquisition of the right, title and interest in the Specific Properties, any additional facts supporting the petitioner's claim, and the relief sought, pursuant to Title 21, United States Code, Section 853(n).

9. Pursuant to 32.2 (b)(6)(A) of the Federal Rules of Criminal Procedure, the Government shall send notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.

10. Upon adjudication of all third-party interests, this Court will enter a Final Order of Forfeiture with respect to the Specific Properties pursuant to Title 21, United States Code, Section 853(n), in which all interests will be addressed. All Specific Properties forfeited to the United States under a Final Order of Forfeiture shall be applied towards the satisfaction of the Money Judgment.

11. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the defendant up to the uncollected amount of the Money Judgment.

12. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

13. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture as to Specific Properties/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

14. The Clerk of the Court shall forward three certified copies of this Consent Preliminary Order of Forfeiture as to Specific Properties/Money Judgment to Assistant United States Attorney Alexander J. Wilson, Co-Chief of the Money Laundering and Transnational Criminal Enterprises Unit, United States Attorney's Office, One St. Andrew's Plaza, New York, New York 10007.

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15. The signature page of this Consent Preliminary Order of Forfeiture as to Specific Properties/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By:


BRIAN R. BLAIS

Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Tel.: (212) 637-2521

1/31/20
DATE

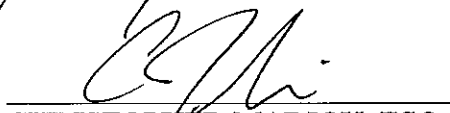
JASON GALANIS

By:


JASON GALANIS

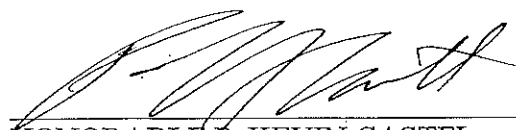
1/31/20
DATE

By:


CHRISTOPHER MADIOU, ESQ.
Attorney for Defendant
Wool Worth Building
233 Broadway, Suite 2208
New York, NY 10279

1/31/20
DATE

SO ORDERED:


HONORABLE P. KEVIN CASTEL
UNITED STATES DISTRICT JUDGE

1-31-20
DATE